09/08/2011 04:27 PM

Sounds like Ecology may have some review work to complete on the M-91 PMP. While I can't make any representation as to what actions the EPA may elect to take in response to the NEIC inspection, it would look awkward at best if there is Ecology approval of a TPA primary document describing actions in conflict with (read - in violation of) the dangerous waste regulations.

Good catch...

#### Dave

"Biebesheimer, Joanette (ECY)" Dave, I had some down time and... 09/08/2011 04:19:59 PM

From: "Biebesheimer, Joanette (ECY)" <JBIE461@ECY.WA.GOV>

To: Dave Bartus/R10/USEPA/US@EPA

Cc: "Conaway, Kathy (ECY)" < KCON461@ECY.WA.GOV>

Date: 09/08/2011 04:19 PM

Subject: In Trench Treatment MWT 31 and 34

### Dave,

I had some down time and decided to review the M-91 PMP for some light reading. I came across this section about in trench treatment that is quite troubling.

FYI

### Joanette

HNF-19169, REV. 9 3-1

# 3 Treatment and Disposal of Mixed Low-Level Waste (M-091-42 and M-091-43)

Substantial progress has been made in recent years in the treatment and disposal of MLLW, which was once thought to have no-path-forward. Since 1997, over 9,500 m<sub>3</sub> of MLLW has been treated and disposed. The majority of this MLLW has been treated using commercial capabilities and disposed onsite at either the MWTs or ERDF. As of May 15, 2011, 1734 m<sub>3</sub> of MLLW remained to be treated and disposed, 266 m<sub>3</sub> is in aboveground storage and a projected 1,468 m<sub>3</sub> of RSW that will assay as MLLW. The combination of commercial capabilities and in-trench treatment will continue to be used for treating the remaining MLLW. The MLLW remaining that cannot currently be treated either commercially or by in-trench treatment is considered no-path-forward waste. Disposition of this waste is covered under Milestone M-091-03D-02, as discussed in Chapter 6.

Current commercial facilities under contract include:

Perma-Fix Northwest, located in Richland, Washington

East Tennessee Material and Energy Corporation, Inc., located in Oak Ridge, Tennessee

Perma-Fix Diversified Scientific Services, Inc., located in Tennessee

Energy Solutions Clive Site, located in Utah

## Impact Services, located in Tennessee

In-trench treatment of the waste will continue to be performed to meet the LDR. This is performed within MWTs 31 and 34 of the 218-W-5 LLBG to minimize significant worker risks and physical infrastructure limitations associated with opening and processing some of the RH-MLLW. In March 2011, 30 m<sub>3</sub> of waste was macro-encapsulated in MWT 34 (see Table 5-2)

## Joanette Biebesheimer

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